

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

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Joseph Lee Wood

2016 JUN 10 A 8:59

Complaint for a Civil Case

DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA, SC

Case No. 2:16-CV-1897-DCN-BM

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Sean Keefer, ~~XXXXXXXXXX~~ JW
Jessica Means, ~~XXXXXXXXXX~~ JW
~~XXXXXXXXXX~~ DSS Berkeley County

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Job or Title Attorney
 (if known)
 Street Address 1816 Belgrade Ave Suite 101
 City and County Charleston (Charleston)
 State and Zip Code SC 29407
 Telephone Number 843-654-4470

Defendant No. 4
 Name ~~William Daxman~~ (SW)
 Job or Title ~~Attorney~~
 (if known)
 Street Address ~~101 Belgrade Ave~~ JW
 City and County ~~Charleston~~ JW
 State and Zip Code ~~SC 29407~~ JW
 Telephone Number ~~843-654-4470~~ 1747 (SW)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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 amt of \$170
 removed as
 crucial to t

↓

Also- Keefer-
 Dismissal
 of \$3500
 Fee court-ordered
 to Mr. Keefer

Continued ~~III~~ - Statement of claim
 my son on a regular basis.

- ① Sean Keefer, appointed Guardian ad Litem did not protect my child in that he paid no immediate attention to the report ~~that was~~ made to DSS ~~for~~ for sexual abuse and medical neglect. Sean Keefer, appointed Guardian ad Litem did not protect my child by enforcing that Amari, my son, would keep his appointment with Dr. Daniels, a child psychologist, who could adequately diagnose ADHD. Sean Keefer, appointed Guardian ad Litem made one visit to observe Amari at school within a one year period. When making his report to Judge Landis Mr. Keefer did not lay out all the facts:
- ① Amari ~~was~~ suffered a burn on his arm, masturbating on a regular basis, blisters and scars around the rectal area, et.

(5u)
2)

Jessica Means, attorney for primary caregiver, Quintell Reid.

Jessica Means demand that I pay for Ms. Reid's court costs although I was never married to Ms. Reid. Ms. Reid and Mr. Mixson both were concerned about receiving money from me and they both were told to go into chambers during Family Court. I was not made privy to the exact conversation, but my lawyer Mr. Mixson told me that it would do no good to try to present evidence to this judge so he just gave into the judge but was quick to charge me ~~\$2000~~ \$2000.00.

(5w)
3) Dept. of Social Services, Berkeley County

When a call was made to report suspected child abuse/medical neglect, the case was accepted. A caseworker was assign to investigate. A visit was made to primary caregiver's home, Quintel Reid, who is also a DSS Caseworker. The Caseworker assigned, Austin Cummins, reports that he Found no evidence of child abuse/medical neglect. Mr. Cummins has the same job title as the primary caregiver, Quintel and I think there was a bias presentation in favor of primary caregiver, Quintel Reid. I blame the Dept of Social Services for not protecting my son, Amari.

Continued: Relief

(JW) My wife and I have been representing
 as I have been my wife and I have been
 acknowledged and refused to be
 evidence to be presented in my behalf
 and ultimately in ~~the~~ ~~case~~ of my son,
 Amar.

- 2) Jessica Means - Dismissal of a \$6,000
 Fee court-ordered to the defendant's
 attorney for fees.
- 3) DSS Berkeley County - Mishandling and/
 or neglect to act properly toward
 the complaint involving medical neglect
 and sexual abuse in the case involving
 my son, Amar.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6-2, 2016

Signature of Plaintiff

Printed Name of Plaintiff


Joseph L Woods

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

